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7 Attorney for Creditor TODD HEARN

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**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

In re  
PG&E CORPORATION  
&  
PACIFIC GAS & ELECTRIC COMPANY,  
Debtors

TODD HEARN  
Creditor and Moving Party

v.  
PACIFIC GAS & ELECTRIC COMPANY  
Debtor & Responding Party

Bankruptcy Case No. 19-30088

Chapter 11

**DECLARATION OF  
TODD HEARN  
SUBMITTED WITH  
SUPPLEMENTAL BRIEF  
IN SUPPORT OF  
MOTION FOR RELIEF  
FROM AUTOMATIC STAY**

Dept: Courtroom 17, 16<sup>th</sup> Floor  
450 Golden Gate Avenue  
San Francisco, CA 94102

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1. I am an adult above the age of eighteen years of age. I have personal knowledge of the facts contained herein and if called as a witness I could and would testify competently thereto.
2. I worked as a lineman for PG&E for over 20 years.
3. On January 22, 2019 PG&E terminated my employment.
4. In August of 2019 I received the attached letter (“Exhibit A”) informing me that I am ineligible for rehire with PG&E, and ineligible to work on PG&E projects or for any PG&E contractor or subcontractor working on PG&E projects.
5. PG&E’s lawyer Stacy Campos stated in the Declaration she provided to the Court that I could just obtain employment with another utility or with a municipality. As a career lineman I am familiar with the utilities and municipalities in the Northern California area. There are not any other utilities within several hours of my home in Napa, and as such I can’t work as a lineman for a utility unless I commuted to Bakersfield, Nevada, or up north past Mt. Shasta.
6. There are municipalities in Sacramento, Santa Clara, and Ukiah, but these are also far from (at least an hour away from) my home in Napa. Because of my family responsibilities (I have two minor children who live at home with me) it would be extremely difficult for me to commute several hours each day. Despite this I have applied for work with these municipalities, but have not received any job offer.
7. When PG&E fired me in January, I stopped receiving income and lost my health benefits for me and for my family. I have exhausted all of my savings, and have been forced to withdraw money early from my 401K in order to cover my mortgage payments. I have sold my truck and a family car to try to keep up with my financial obligations, but am severely behind on the payments for my children’s school, and am becoming increasingly concerned about how we will make ends meet.

8. I understand that the legal process of pursuing a whistleblower retaliation Court case may take a long time, but every month counts for me and for my family, and so I therefore request that the Court allow me to move forward and start

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. This declaration was executed on December 30, 2019.

\_\_\_\_\_/s/ *Todd Hearn*\_\_\_\_\_  
Todd Hearn

# EXHIBIT A

# EXHIBIT A



*Pacific Gas and  
Electric Company®*

-- Ineligible (no change) for Rehire Letter --

Pacific Gas and Electric Company  
Human Resources

08/02/2019

Todd N. Hearn  
Personnel Number: #75822  
LAN ID: TNH3  
[REDACTED] Napa, CA 94559

Phone: [REDACTED]

Email: [REDACTED]

Dear Mr. Todd N. Hearn,

This message is to confirm that your employment status with Pacific Gas and Electric Company (PG&E) has been recently reviewed. At this time, we have decided that your status will remain as "Ineligible" for rehire with PG&E including as a hiring hall employee, or as an agency worker, contractor or subcontractor working on PG&E projects.

If you have any additional questions, please contact us directly via email at [HREmploymentEligibilityReviewCommittee@pge.com](mailto:HREmploymentEligibilityReviewCommittee@pge.com).

Sincerely,

Employment Eligibility Review Committee